

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In Re:

Case No. 24-31547

Marko Kamel

Debtor,

Chapter 13

**MOTION TO DISMISS CHAPTER 13 CASE PURSUANT TO
11 USC SEC. 1307(b)**

TO THE DEBTOR, CHAPTER 13 TRUSTEE, UNITED STATES TRUSTEE AND
OTHER PARTIES ENTITLED TO NOTICE UNDER LOCAL RULE 9013-2.

1. Marko Kamel, the “Movant”, moves the court for the relief requested below and gives notice of hearing.
2. The court will hold a hearing on this motion at August 21, 2024 @ 9:30AM, before the before the Honorable Michael E. Ridgway, United States Bankruptcy Court Judge, at Courtroom 7 West, 300 South Fourth Street, Minneapolis, Minnesota 55415.
3. Any response to this motion must be filed and served not later than August 14, 2024, which is seven days before the time set for the hearing (including Saturdays, Sundays, and holidays). UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.
4. The petition commencing this chapter 13 case was filed on 6/13/2024. The case is now pending in this court. The court has jurisdiction over this motion pursuant to 28 U.S.C. § 157 and § 1305 and § 1329, Fed. R. Bankr. P. 5005, Bankruptcy Local Rule 1070-1, 3015-2(b), and applicable rules.

MOTION

5. The Movant, by and through his attorney, moves the court to dismiss his case pursuant to 11 USC Sec. 1307(b).

MEMORANDUM OF LAW AND FACTS IN SUPPORT OF MOTION

A debtor is allowed to dismiss a Chapter 13 case pursuant to 11 U.S.C. § 1307(b).

This statute states as follows:

On request of the debtor at any time, if the case has not been converted under section 706, 1112, or 1208 of this title, the court shall dismiss a case under this chapter. Any waiver of the right to dismiss under this subsection is unenforceable.

11 U.S.C. § 1307(b).

Dismissal is necessary because claims have been filed that far exceed the debt ceiling of chapter 13. Debtor is ineligible to be in a chapter 13 bankruptcy. The Movant respectfully requests that his chapter 13 proceeding be dismissed.

Dated July 30, 2024

By /s/ Barbara J May
Barbara J May #129689
1915 Highway 36W
Roseville, MN 5113
Tel: 651.486-8887
Fax: 651.486-8890
Barbara@barbaramaylawoffice.com
Attorney for Debtor

VERIFICATION

Marko Kamel, having reviewed the attached document , declares under penalty of perjury that he knows the information contained herein to be true and correct to the best of his knowledge.

Dated:7/30/2024

DocuSigned by:

8BF175BD67C64CA
Marko Kamel

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

Case # 24-31547
Chapter 13

In Re:)
)
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Marko Kamel)
)
)
)
) **ORDER DISMISSING CASE**
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)
)
)

Debtor,

This matter came before the Court on the debtor's motion to dismiss her chapter 13 proceeding. Based on the file, record and proceedings,

IT IS ORDERED:

1. That the debtor's motion is APPROVED and the chapter 13 case is dismissed.

BY THE COURT:

Dated: _____

Michael E. Ridgway
United States Bankruptcy Judge

Barbara J. May, being duly sworn upon oath, says that on the 30th day of July, 2024, she served the Debtor's

Motion to dismiss on:

Gregory Burrell
100 South Fifth Street, Suite 480
Minneapolis, MN 55402

United States Trustee
300 S 4th St Ste 1015
Minneapolis, MN 55415

All creditors on attached matrix

/e/ Barbara J. May

Barbara J. May

Case 24-31547 Doc 20 Filed 07/30/24 Entered 07/30/24 16:23:14 Desc Main
Label Matrix for local noticing Minnesota Implant Center P.L.C. Document Page 6 of 6 QL Titling Trust LTD/Quality Leasing Co., In
0864-3 c/o Chapter 7 Trustee 9830 Bauer Dr
Case 24-31547 Nauni Manty Carmel, IN 46280-1972
District of Minnesota 150 South Fifth Street, Suite 3125
St Paul Minneapolis, MN 55402-4221
Fri Jul 12 12:00:54 CDT 2024

St Paul
200 Warren E. Burger Federal Building
and U.S. Courthouse
316 N Robert St
St Paul, MN 55101-1495

(p) ALLIANT CREDIT UNION
BANKRUPTCY DEPARTMENT
11545 W TOUHY AVE
CHICAGO IL 60666-5000

AMERICAN EXPRESS
CUSTOMER SERVICE
PO BOX 981535
EL PASO TX 79998-153
EL PASO TX 79998-1535

(p) BMW FINANCIAL SERVICES
CUSTOMER SERVICE CENTER
PO BOX 3608
DUBLIN OH 43016-0306

BMW Financial Services NA, LLC
1400 City View Drive
Columbus, OH 43215-1477

Barbara J. May Attorney at Law
1915 Highway 36 W
Suite 103
Roseville, MN 55113-2709

INTERNAL REVENUE SERVICE
INSOLVENCY SECTION
PO BOX 7346
PHILADELPHIA, PA 19101-7346

John Degnan
80 S 8th St
Minneapolis, MN 55402-2100

LARKIN HOFFMAN
8300 NORMAN CENTER DRIVE
SUITE 1000
MPS, MN 55437-1060

MICHEAL MEDICAL IGH
3120 WOODBURY DRIVE
WOODBURY, MN 55129-9600

Nicole Brant
33 S. 6th Street
Suite 4400
Mpls, MN 55402-3710

TD AUTO FINANCE
1650 W 82D ST
BLOOMINGTON, MN 55431-1419

US Trustee
1015 US Courthouse
300 S 4th St
Minneapolis, MN 55415-3070

Barbara J May
Barbara J. May Law Firm
1915 Highway 36 West
Suite 103
Roseville, MN 55113-2709

Gregory A Burrell
100 South Fifth Street
Suite 480
Minneapolis, MN 55402-1250

Marko Kamel
1508 Clippership
Woodbury, MN 55125-8591

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

ALLIANT CREDIT UNION
11545 TOUHY AVE
CHICAGO IL 60666

BMW FINANCIAL SERVICES
5515 PARKCENTER CIRCLE
DUBLIN, OH 43017

End of Label Matrix	
Mailable recipients	18
Bypassed recipients	0
Total	18